

TO: William Miller, District Engineer

From: Jane Tobin

**Ex. 6 - Personal Privacy**

RE: Proposed Permit for Vigneto

Mr. Miller,

As a concerned citizen and part time resident of Green Valley, I am very concerned about the proposed development of The Vigneto development in Benson, AZ. From the information sent to me by numerous groups, the possible development of this complex would be highly detrimental to the San Pedro Valley.

Here are some points I would like you to consider:

the Villages at Bigneto is new and a different development proposal from the previous proposal to the Whetstone Ranch. It is a larger development and would impact the San Pedro River in ways that it may never recover. The permit for this development should be evaluated for water compliance and re-evaluated to consider changed circumstances that would impact this area for decades.

The Villages at Vigneto poses a potential threat to an EPA-designated aquatic resource of national importance, two globally important bird areas on the San Pedro River, the BLM managed San Pedro Riparian National Conservation area and the wet cave system at Kartchner Caverns State Park.

Wildlife dispersal linkages and habitat connectivity were not adequately considered in the analysis for the previous permit for the Whetstone Ranch and have not been considered for the Vigneto Development. Both the endangered jaguar and ocelot are identified as focal species for this area.

Part three of the three-part hydrologic study by the USGS that was planned to model water movement along the San Pedro River basin should be funded, completed and fully considered before the Vigneto development is permitted to proceed.

The amount of water Vigneto would pump from the shallow aquifer is estimated to be approximately 10,000 acre-feet of water per year. By comparison, in 2013 the City of Benson only pumped 833 acre feet of water per year. The combined impacts of dramatically increased ground water pumping, ongoing drought, and predicted climate change-induced megadroughts should be considered carefully by the ACE, EPA, USFWS and the Benson City Council.

Please consider the points I have mentioned and carefully review the potential impact of this development to determine if it should receive any permit do go forward.

I am a birdwatcher and lover of this area. To see it dry up and lose the habitat for migratory birds would be a true disaster. There is plenty of space in Arizona to develop mega housing projects and this is not

one of the areas to ruin.

Thank you for your attention to my remarks and I hope you and your agency will act quickly to determine if the Vigneto project should be halted.

Sincerley,  
Jane Tobin